



Air Quality Permitting Statement of Basis

July 30, 2008

Tier I Operating Permit No. T1-2008.0077

Nonpareil Corporation, Blackfoot

Facility ID No. 011-00027

Prepared by:

**Morrie Lewis, Permit Writer
Air Quality Division**

DRAFT FOR PUBLIC COMMENT

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Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
Btu/hr	British thermal units per hour
CAA	Clean Air Act
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
HAP	Hazardous Air Pollutants
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
lb/hr	pounds per hour
MACT	Maximum Available Control Technology
MMBtu	million British thermal units
MMscf	million standard cubic feet
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	Permit to Construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	Tons per year
µg/m ³	micrograms per cubic meter
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compounds

1. PURPOSE

The purpose of this memorandum is to explain the legal and factual basis for this Tier I operating permit in accordance with IDAPA 58.01.01.362.

The Department of Environmental Quality (DEQ) has reviewed the information provided by Nonpareil Corporation regarding the operation of its facility located in Blackfoot. This information was submitted based on the requirements to submit a Tier I operating permit application in accordance with IDAPA 58.01.01.313.01.d.ii.

2. FACILITY DESCRIPTION

Nonpareil is a potato processing company that packs, processes, and dehydrates various potato products. The Nonpareil Corporation has three plants, all of which are contained within the same property boundary: Idaho Potato Packers, Nonpareil Dehydrated, and Nonpareil Processing.

- Idaho Potato Packers - a fresh potato facility where potatoes are washed, sorted, sized, and packaged.
- Nonpareil Dehydrated - obtains potatoes from Idaho Potato Packers. Potatoes are peeled or not peeled, scrubbed, sorted, sliced or diced, wet sorted, blanched, and dried to form dehydrated potato pieces including slices, dices, strips, crush, and hash browns. Unacceptable wet and some unacceptable dried potatoes are taken to Nonpareil Processing.
- Nonpareil Processing - produces dehydrated potato flakes, flour, agglomerate, dried starch, and other flake and flour-based potato products. Potatoes may be peeled and are scrubbed, sorted, slabbed, precooked or not precooked, cooled, cooked, riced, and dried. Products are dried to 6% moisture and are broken up and grinded to customer specifications, packaged or stored, and then sold. This is the site where the east and west boilers are located. The process also includes dryers, flakers, peelers, and baghouse equipment, which are also sources of emissions.

3. FACILITY/AREA CLASSIFICATION

This facility is a major facility as defined by IDAPA 58.01.01.008.10 because it emits or has the potential to emit a regulated air pollutant(s) in amounts greater than or equal to major facility threshold(s) listed in Subsection 008.10. Controlled emissions of PM₁₀, NO_x, and SO₂ each exceed the major source threshold of 100 tons per year; refer to Section 6.2 for an emissions inventory of the regulated air pollutants emitted by this facility.

This facility is not a designated facility as defined by IDAPA 58.01.01.006.30.

This facility is not a major facility as defined by IDAPA 58.01.01.205 because it does not emit or have the potential to emit a regulated criteria air pollutant in amounts greater than or equal to 250 tons per year.

The Standard Industrial Classification (SIC) defining the facility is 2034, and the Aerometric Information Retrieval System (AIRS) facility classification is A.

The facility is located in Blackfoot, which is classified as unclassifiable for all criteria pollutants (PM₁₀, PM_{2.5}, CO, NO₂, SO_x, and ozone). There is not a Class I area(s) within 10 kilometers (km) of the facility. This facility is located in Air Quality Control Region (AQCR) 61 and Universal Transverse Mercator (UTM) Zone 12.

4. APPLICATION SCOPE

The scope of the Tier I operating permit application is to incorporate all existing permits to construct and all other applicable requirements. This is a new Tier I operating permit and does not replace an existing Tier I operating permit.

5. SUMMARY OF EVENTS

May 8, 2008	DEQ receives a Tier I operating permit application.
July 7, 2008	DEQ determines the Tier I operating permit application complete.
July 18, 2008	DEQ issues draft Tier I permit and statement of basis to facility for review. No comment was received.
July 30 through August 29, 2008	Public comment period was held.

5.1 *Permitting History*

August 5, 2002	T2-9811-169-2 (011-00027), issued August 5, 2002.
May 9, 2007	PTC No. P-050300, issued May 9, 2007.
June 13, 2008	PTC No. P-2008.0057, issued June 13, 2008.

6. PERMIT ANALYSIS

6.1 *Basis of Analysis*

The following documents were relied upon in preparing this memorandum and the Tier I operating permit:

- PTC No. P-2008.0057, issued June 13, 2008.
- Tier I operating permit application received May 8, 2008.
- Guidance developed by the U.S. Environmental Protection Agency (EPA) and DEQ

6.2 Emissions Description and Emissions Inventory

Table 6.1 CONTROLLED EMISSIONS INVENTORY

Description	NO _x Emissions		CO Emissions		PM ₁₀ Emissions ^a		SO _x Emissions		VOC Emissions		Lead Emissions	
	lb/hr ^b	T/yr ^c	lb/hr ^b	T/yr ^c	lb/hr ^b	T/yr ^c	lb/hr ^b	T/yr ^c	lb/hr ^b	T/yr ^c	lb/hr ^b	T/yr ^c
Processing East Boiler	2.618	11.467	4.398	19.264	0.398	1.743	0.031	0.138	0.288	1.261	2.62E-05	1.15E-04
Processing West Boiler	14.85	56.617	3.335	14.609	5.119	19.267	66.542	247.883	0.346	1.43	4.08E-04	1.53E-03
Starch Dryer	0.412	1.804	0.346	1.515	0.37	1.6	0.002	0.011	0.023	0.099	2.06E-06	9.02E-06
Scratch Mash Dryers	0.539	2.362	0.453	1.984	2.56	11.22	0.003	0.014	0.03	0.13	2.70E-06	1.18E-05
Processing Peeler Exhaust					0.16	0.7						
Flaker No. 1					3.79	16.62						
Flaker No. 2					3.79	16.62						
Flaker No. 3					3.04	13.29						
Flaker No. 4					3.04	13.29						
Flaker No. 5					3.04	13.29						
Dehydration Air Dryer #1 A Stage	0.627	2.748	0.527	2.309	1.47	6.43	0.004	0.016	0.035	0.151	3.14E-06	1.37E-05
Dehydration Air Dryer #1 B&C Stages	0.275	1.202	0.231	1.01	0.65	2.83	0.002	0.007	0.015	0.066	1.37E-06	6.01E-06
Dehydration Air Dryer #2 A Stage	0.627	2.748	0.527	2.309	1.47	6.43	0.004	0.016	0.035	0.151	3.14E-06	1.37E-05
Dehydration Air Dryer #2 B&C Stages	0.275	1.202	0.231	1.01	0.65	2.83	0.002	0.007	0.015	0.066	1.37E-06	6.01E-06
Dehydration Air Dryer #3 A Stage	0.627	2.748	0.527	2.309	1.47	6.43	0.004	0.016	0.035	0.151	3.14E-06	1.37E-05
Dehydration Air Dryer #3 B&C Stages	0.275	1.202	0.231	1.01	0.65	2.83	0.002	0.007	0.015	0.066	1.37E-06	6.01E-06
Dehydration Air Dryer #4 A Stage	0.468	2.048	0.393	1.721	1.1	4.82	0.003	0.012	0.026	0.113	2.34E-06	1.02E-05
Dehydration Air Dryer #4 B Stage	0.032	0.142	0.027	0.119	0.47	2.06	0	0.001	0.002	0.008	1.62E-07	7.09E-07
Dehydration Air Dryer #4 C Stage	0.029	0.129	0.025	0.108	0.47	2.06	0	0.001	0.002	0.007	1.47E-07	6.44E-07
Dehydration Air Dryer #5 A Stage	1.02	4.466	0.856	3.751	1.78	7.8	0.006	0.027	0.056	0.246	5.10E-06	2.23E-05
Dehydration Air Dryer #5 B Stage	0.314	1.374	0.264	1.154	0.77	3.39	0.002	0.008	0.017	0.076	1.57E-06	6.87E-06
Dehydration Air Dryer #5 C Stage	0.324	1.417	0.272	1.19	0.77	3.39	0.002	0.009	0.018	0.078	1.62E-06	7.09E-06
Dehydration Bin Dryer					0.63	2.74						
Dehydration Research Dryer	0.086	0.378	0.072	0.317	0.18	0.8	0.001	0.002	0.005	0.021	4.31E-07	1.89E-06
Dehydration Steam Peeler					0.16	0.7						
Dehydration North Boiler	1.029	4.509	0.865	3.787	0.078	0.343	0.006	0.027	0.057	0.248	0	0
Dehydration South Boiler	0.824	3.607	0.692	3.03	0.063	0.274	0.005	0.022	0.045	0.198	0	0
Scratch Mash Air Makeup	0.49	2.147	0.412	1.804	0.037	0.163	0.003	0.013	0.027	0.118	0	0
Reblend Room Air Makeup	0.098	0.429	0.082	0.361	0.007	0.033	0.001	0.003	0.005	0.024	0	0
Building #3 Air Makeup	0.294	1.288	0.247	1.082	0.022	0.098	0.002	0.008	0.016	0.071	0	0
Building #4 Air Makeup	0.98	4.294	0.824	3.607	0.075	0.326	0.006	0.026	0.054	0.236	0	0
Wet Area Air Makeup	0.343	1.503	0.288	1.262	0.026	0.114	0.002	0.009	0.019	0.083	0	0

(Table 6.1 continued)	NO _x Emissions		CO Emissions		PM ₁₀ Emissions ^a		SO _x Emissions		VOC Emissions		Lead Emissions	
Description	lb/hr ^b	T/yr ^c	lb/hr ^b	T/yr ^c	lb/hr ^b	T/yr ^c	lb/hr ^b	T/yr ^c	lb/hr ^b	T/yr ^c	lb/hr ^b	T/yr ^c
South Dryer Room 4&5 Air Makeup	0.49	2.147	0.412	1.804	0.037	0.163	0.003	0.013	0.027	0.118	0	0
South Dryer Room 4&5 Roof Air Makeup	0.49	2.147	0.412	1.804	0.037	0.163	0.003	0.013	0.027	0.118	0	0
Inspection Room Roof Air Makeup	0.343	1.503	0.288	1.262	0.026	0.114	0.002	0.009	0.019	0.083	0	0
Scratch Mash Baghouse					4.30E-04	1.88E-03						
Grinding Circuit No. 1 Baghouse					4.30E-04	1.88E-03						
Starch Plant Baghouse					8.60E-04	3.77E-03						
Grinding Circuit No. 2 Baghouse					5.78E-04	2.53E-03						
Flake Baghouse					1.20E-03	5.27E-03						
Packing Baghouse No. 1					1.08E-04	4.74E-04						
Packing Baghouse No. 2					3.01E-04	1.32E-03						
Crush-room Baghouse No. 1					1.08E-04	4.74E-04						
Crush-room Baghouse No. 2					3.01E-04	1.32E-03						
TOTAL	28.78	117.63	17.24	75.49	38.39	164.99	66.64	248.32	1.26	5.54	0.0005	0.0019

^aParticulate Matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers

^bPounds per hour

^cTons per year

Table 6.1 shows the emissions sources at the facility with the maximum design rates and associated control equipment, and considering permit conditions limiting operating hours and fuel usage rates.

7. REGULATORY ANALYSIS

7.1 IDAPA 58.01.01.313.01 – Original Tier I Operating Permits.

This permitting action is a new Tier I operating permit. New Tier I operating permits are subject to the requirements of IDAPA 58.01.01.313.01.

7.2 New Source Performance Standards (NSPS) – 40 CFR 60

The east processing boiler is subject to the requirements of 40 CFR 60 Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units because the total heat input is between 10 and 100 MMBtu/hr and the unit was constructed after 1989.

Subpart Dc

40 CFR 60, Subpart DcStandards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

40 CFR 60.40cApplicability and delegation of authority

The east processing boiler is an affected facility in accordance with §60.40c(a), because construction of the boiler commenced after June 9, 1989, and because the maximum design heat input capacity for the boiler is between 10 and 100 MMBtu/hr (53.4 MMBtu/hr).

40 CFR 60.41cDefinitions

This section contains the definitions of this subpart.

40 CFR 60.42cStandard for sulfur dioxide (SO₂)

In accordance with §60.42c(d), on and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess of 215 ng/J (0.50 lb/MMBtu) heat input; or, as an alternative, no owner or operator of an affected facility that combusts oil shall combust oil in the affected facility that contains greater than 0.5 weight percent sulfur. Nonpareil has elected to comply with this requirement by only combusting fuel oil with a sulfur content less than 0.5 weight percent. In accordance with §60.42c(h), for distillate oil-fired affected facilities with heat input capacities between 2.9 and 29 MW (10 and 100 MMBtu/hr, compliance with the emission limits or fuel oil sulfur limits under this section may be determined based on a certification from the fuel supplier, as described under §60.48c(f), as applicable.

In accordance with §60.42c(i), the SO₂ emission limits, fuel oil sulfur limits, and percent reduction requirements under this section apply at all times, including periods of startup, shutdown, and malfunction.

Permit Condition 3.5 includes the requirements of this section.

40 CFR 60.43c Standards for particulate matter (PM)

In accordance with §60.43c(c), on and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that combusts coal, wood, or oil and has a heat input capacity of 8.7 MW (30 MMBtu/hr) or greater shall cause to be discharged into the atmosphere from that affected facility any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.

In accordance with §60.43c(d), the PM and opacity standards under this section apply at all times, except during periods of startup, shutdown, or malfunction.

In accordance with §60.43c(e)(4), on and after the date on which the initial performance test is completed or is required to be completed under §60.8, whichever date comes first, an owner or operator of an affected facility that commences construction, reconstruction, or modification after February 28, 2005, and that combusts only oil that contains no more than 0.50 weight percent sulfur and not using a post-combustion technology (except a wet scrubber) to reduce PM or SO₂ emissions is not subject to the PM limit in this section. Nonpareil has elected to comply with this requirement by only combusting fuel oil with a sulfur content less than 0.5 weight percent.

Permit Condition 3.2 includes the opacity limit and associated requirements of this section.

40 CFR 60.44cCompliance and performance test methods and procedures for sulfur dioxide

In accordance with §60.44c(h), for affected facilities subject to §60.42c(h) where the owner or operator seeks to demonstrate compliance with the SO₂ standards based on fuel supplier certification, the performance test shall consist of the certification, the certification from the fuel supplier, as described under §60.48c(f), as applicable. Permit Condition 3.15 includes the requirements of this section.

40 CFR 60.45cCompliance and performance test methods and procedures for particulate matter

In accordance with §60.45c(a), the owner or operator of an affected facility subject to the PM and/or opacity standards under §60.43c shall conduct an initial performance test as required under §60.8, and shall conduct subsequent performance tests as requested by the Administrator, to determine compliance with the standards using the following procedures and reference methods, except as specified in paragraph (c) of this section. In accordance with §60.45c(a)(8), Method 9 of appendix A of this part (6-minute average of 24 observations) shall be used for determining the opacity of stack emissions.

In accordance with §60.45c(d), the owner or operator of an affected facility seeking to demonstrate compliance under §60.43c(e)(4) shall follow the applicable procedures under §60.48c(f).

Permit Condition 3.11 includes the requirements of this section.

40 CFR 60.46cEmission monitoring for sulfur dioxide

In accordance with §60.46c(e), the monitoring requirements of paragraphs (a) and (d) of this section shall not apply to affected facilities subject to §60.42c(h) where the owner or operator of the affected facility seeks to demonstrate compliance with the SO₂ standards based on fuel supplier certification, as described under §60.48c(f), as applicable.

40 CFR 60.47cEmission monitoring for particulate matter

In accordance with §60.47c(c), affected facilities that burn only distillate oil that contains no more than 0.5 weight percent sulfur and/or liquid or gaseous fuels with potential sulfur dioxide emission rates of 26 ng/J (0.06 lb/MMBtu) heat input or less and that do not use a post-combustion technology to reduce SO₂ or PM emissions are not required to operate a CEMS for measuring opacity if they follow the applicable procedures under §60.48c(f).

40 CFR 60.48cReporting and recordkeeping requirement

In accordance with §60.48c(a), the owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup, as provided by §60.7.

In accordance with §60.48c(b), the owner or operator of each affected facility subject to the SO₂ emission limits of §60.42c, or the PM or opacity limits of §60.43c, shall submit to the Administrator the performance test data from the initial and any subsequent performance tests and, if applicable, the performance evaluation of the CEMS and/or COMS using the applicable performance specifications in appendix B of this part.

In accordance with §60.48c(c), the owner or operator of each coal-fired, oil-fired, or wood-fired affected facility subject to the opacity limits under §60.43c(c) shall submit excess emission reports for any excess emissions from the affected facility that occur during the reporting period.

In accordance with §60.48c(d), the owner or operator of each affected facility subject to the SO₂ emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall submit reports to the Administrator.

In accordance with §60.48c(e), the owner or operator of each affected facility subject to the SO₂ emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall keep records and submit reports as required under paragraph (d) of this section, including the following information, as applicable. In accordance with §60.48c(e)(11), if fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph (f)(1), (2), (3), or (4) of this section, as applicable. In addition to records of fuel supplier certifications, the report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

In accordance with §60.48c(f), fuel supplier certification shall include the following information for distillate oil: (i) The name of the oil supplier; (ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in §60.41c; and (iii) The sulfur content of the oil.

In accordance with §60.48c(g)(1), except as provided under paragraphs (g)(2) and (g)(3) of this section, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day. In accordance with §60.48c(g)(2), as an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month. In accordance with §60.48c(g)(3), as an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in §60.42c to use fuel certification to demonstrate compliance with the SO₂ standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.

In accordance with §60.48c(i), all records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

In accordance with 40 CFR 60.48c(j), the reporting period for any reports required pursuant to this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.

Permit Condition 3.19 includes the requirements of this section.

7.3 **National Emission Standards for Hazardous Air Pollutants (NESHAP) – 40 CFR Parts 61 & 63**

This facility is not subject to any NESHAP.

The facility does not belong to any of the specific source categories regulated by 40 CFR 63, and is below the major source thresholds of 10 tons/yr for each individual HAP and 25 tons/yr for any combination of HAP. The facility is therefore not subject to MACT standards.

7.4 **Compliance Assurance Monitoring (CAM) – 40 CFR 64**

The emissions units at this facility are not subject to the requirements of 40 CFR 64— Compliance Assurance Monitoring (CAM).

40 CFR 64Compliance Assurance Monitoring

40 CFR 64.2Applicability

In accordance with §64.2(a), except for backup utility units that are exempt under paragraph (b)(2) of this section, the requirements of this part shall apply to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:

- (1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under paragraph (b)(1) of this section;
- (2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- (3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. For purposes of this paragraph, “potential pre-control device emissions” shall have the same meaning as “potential to emit,” as defined in §64.1, except that emission reductions achieved by the applicable control device shall not be taken into account.

Table 7.1 Emission Units and Control Devices Subject to Emission Limits

Source Description	Emission Limit	Control Device
Processing east and boilers, combined emissions from both boilers	PM ₁₀ , SO ₂	None
Scratch-mash dryers	PM ₁₀	None
Scratch-mash air makeup	PM ₁₀	None
Reblend room air makeup	PM ₁₀	None
Building No. 3 air makeup	PM ₁₀	None
Building No. 4 air makeup	PM ₁₀	None
Processing peeler exhaust	PM ₁₀	None
Flaker Nos. 1 – 5	PM ₁₀	None
Dehydration north boiler	PM ₁₀	None
Dehydration south boiler	PM ₁₀	None
Dehydration air dryer No. 1 A stage	PM ₁₀	None
Dehydration air dryer No. 1 B & C stage	PM ₁₀	None
Dehydration air dryer No. 2 A stage	PM ₁₀	None
Dehydration air dryer No. 2 B & C stage	PM ₁₀	None
Dehydration air dryer No. 3 A stage	PM ₁₀	None
Dehydration air dryer No. 3 B & C stage	PM ₁₀	None
Dehydration air dryer No. 4 A stage	PM ₁₀	None
Dehydration air dryer No. 4 B stage	PM ₁₀	None
Dehydration air dryer No. 4 C stage	PM ₁₀	None
Dehydration air dryer No. 5 A stage	PM ₁₀	None

Dehydration air dryer No. 5 B stage	PM ₁₀	None
Dehydration air dryer No. 5 C stage	PM ₁₀	None
Dehydration bin dryer	PM ₁₀	None
Wet area air makeup	PM ₁₀	None
South dryer room air makeup	PM ₁₀	None
South dryer room roof air makeup	PM ₁₀	None
Inspection room roof air makeup	PM ₁₀	None
Dehydration research dryer	PM ₁₀	None
Dehydration steam peeler	PM ₁₀	None

The facility is a major source that is required to obtain a Part 70 permit; refer to Section 3 for additional information. The pollutants which have the potential to exceed the major source threshold are SO₂, NO_x, and PM₁₀. The emission units which are subject to emissions limitations are listed in Table 7.1.

None of the emission units subject to emission limitations or standards utilize control equipment to achieve compliance with the emissions limitations.

Material transfer operations at the facility do utilize baghouses, shown in Table 7.2.

Table 7.2 Material Transfer Baghouses

Source Description	Emissions Control
Scratch-mash material transfer	Scratch-mash baghouse, Mikropulsaire, 36 bag, 2,500 cfm
Grinding circuit No. 1 material transfer	Grinding circuit No. 1 baghouse, Mikropulsaire, 36 Bag, 2,500 cfm
Starch plant material transfer	Starch plant baghouse, Mikropulsaire, 72 bag, 5,000 cfm
Grinding circuit No. 2 material transfer	Grinding circuit No. 2 baghouse, Mikropulsaire, 48 bag, 3,360 cfm
Flake material transfer	Flake baghouse, Mikropulsaire, 100 bag, 7,000 cfm
Packaging material transfer	Packaging baghouse No. 1, Mikropulsaire, 9 Bag, 630 cfm
Packaging material transfer	Packaging baghouse No. 2, Mikropulsaire, 25 bag, 1,750 cfm
Crush-room material transfer	Crush-room baghouse No. 1, Mikropulsaire, 9 bag, 630 cfm
Crush-room material transfer	Crush-room baghouse No. 2, Mikropulsaire, 25 bag, 1,750 cfm

However based upon information provided in the application and guidance published by EPA¹, the material transfer baghouses were determined to be inherent process equipment rather than control devices. Inherent process equipment is not considered a control device for the purposes of CAM applicability in accordance with 40 CFR 64.1.

8. PERMIT CONDITIONS

The permit conditions included in the Tier I operating permit are incorporated from PTC No. P-2008.0057 and are documented in previous PTC actions. All of the permit conditions in PTC No. P-2008.0057 were incorporated into the Tier I operating permit without change.

This section describes only the additional requirements included as a result of this permitting action.

FACILITY-WIDE CONDITIONS

8.1 Facility-Wide Conditions

Facility-wide conditions include facility-wide fugitive emissions, odors, visible emissions, fuel-burning equipment, fuel sulfur content, open burning, renovation and demolition, accidental release of chemicals, and recycling and emissions reductions. These provisions generally apply to the facility.

¹ November 27, 1995 letter from David Solomon, Office of Air Quality Planning and Standards EPA, to Timothy Mohin regarding the criteria used in determining whether equipment is air pollution control equipment or process equipment.

Should there be a conflict between the facility-wide conditions of this permit (T1-2008.0077) and PTC No. P-2008.0057, issued June 13, 2008, these facility-wide conditions shall govern.

9. INSIGNIFICANT ACTIVITIES

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01.b.i.(5) are listed in Table 7.1 to qualify for a permit shield.

Table 7.1 INSIGNIFICANT ACTIVITIES

Insignificant Emission Point No.	Identification	Quantity	Description
CORPORATE OFFICE			
1	Furnace	5	Carrier Weathermaker 9200 natural gas-fired furnaces (100,000 Btu/hr)
2	Water Heater	1	Paloma Instantaneous natural gas-fired water heater (178,000 Btu/hr)
IDAHO POTATO PACKERS			
3	Space Heater	8	Modine gas-fired space heaters (75,000 Btu/hr)
4	Space Heater	4	Modine gas-fired space heaters (150,000 Btu/hr)
5	Furnace	2	Carrier Weathermaker 9200 natural gas-fired furnaces (100,000 Btu/hr)
NONPAREIL DEHYDRATED			
6	Furnace	2	Carrier Weathermaker 9200 natural gas-fired furnaces (100,000 Btu/hr)
NONPAREIL PROCESSING			
7	Space heaters	1	Modine Knife Room space heater (75,000 Btu/hr)
8	Space heaters	1	Modine Receiving space heater (75,000 Btu/hr)
9	Space heaters	1	Modine Potato Receiving space heater (75,000 Btu/hr)
10	Space heaters	1	Modine Machine Shop space heater (100,000 Btu/hr)
11	Space heaters	1	Modine Starch Plant space heater (150,000 Btu/hr)
12	Space heaters	1	Modine Waste Plant space heater (150,000 Btu/hr)

10. ALTERNATIVE OPERATING SCENARIOS

The facility did not request any alternative operating scenarios.

11. TRADING SCENARIOS

The facility did not request any trading scenarios.

12. COMPLIANCE SCHEDULE

12.1 Compliance Plan

Nonpareil provided a compliance plan in the Tier I application certifying that the facility has demonstrated compliance with and will continue to comply with all applicable federal and state regulatory requirements pursuant to IDAPA 58.01.01.314.10.

12.2 Compliance Certification

Nonpareil Corporation is required to periodically certify compliance in accordance with General Provision 21. The facility shall submit an annual compliance certification for each emissions unit to DEQ and EPA, in accordance with IDAPA 58.01.01.322.11. The compliance certification report shall address the compliance status of each emissions unit with the terms and conditions of this permit.

13. PERMIT REVIEW

13.1 Regional Review of Draft Permit

DEQ provided the draft permit to its Pocatello Regional Office on July 16, 2008. The regional office did not have any comments regarding the draft permit.

13.2 Facility Review of Draft Permit

DEQ provided the draft permit to Nonpareil Corporation for its review on July 18, 2008. The facility indicated that wood products and coal would not be utilized as fuel sources in fuel-burning equipment. The facility-wide permit conditions 2.13 and 2.14 were updated accordingly.

13.3 Public Comment

DEQ provided the draft permit for public comment on July 30, 2008. The public comment period was provided from July 30, 2008 through August 29, 2008.

14. ACID RAIN PERMIT

This facility is not an affected facility as defined in 40 CFR 72 through 75; therefore, acid rain requirements are not applicable.

15. REGISTRATION FEES

This facility is a major facility as defined by IDAPA 58.01.01.008.10; therefore, registration and registration fees in accordance with IDAPA 58.01.01.387 apply. The facility is in compliance with registration and registration fee requirements.

16. RECOMMENDATION

Based on the Tier I operating permit application and review of state rules and federal regulation, staff recommends that DEQ issue Tier I Operating Permit No. T1-2008.0077 to Nonpareil Corporation for its Blackfoot potato processing plant. This permit is a new Tier I operating permit and does not replace any previous Tier I operating permit. The permit was made available for public comment as required by IDAPA 58.01.01.364. The project does not involve PSD permitting requirements.

Appendix A – AIRS Data Entry Form

AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

Facility Name: Nonpareil Corporation

Facility Location: Blackfoot, Idaho

AIRS Number: 011-00027

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION A-Attainment U-Unclassified N- Nonattainment
SO ₂	A		A				A	U
NO _x	A						A	U
CO	B							U
PM ₁₀	A		A				A	U
PT (Particulate)	A		A					---
VOC	B							U
THAP (Total HAP)	B							---
			APPLICABLE SUBPART					
			A, Dc					

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAP only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, or each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAP.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).